

**Uintah Basin Electronic Telecommunications  
d/b/a UBET Wireless  
3843 South Highway 40  
P.O. Box 157  
Roosevelt, Utah 84066**

**Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 – 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554**

**Re: WT Docket No. 01-309  
HAC Digital Wireless Telephones**

**Third Semi-Annual Report**

Dear Ms. Dortch:

The Filer, Uintah Basin Electronic Telecommunications d/b/a UBET Wireless, is the licensee of Cellular Radiotelephone Service Station KNKN236; and of Broadband Personal Communications Service (“PCS”) Stations KNLG530, WPQZ730, WPQZ731 and WPSZ758. This report is submitted pursuant to the requirements of Paragraph Nos. 89 – 91 of the Commission’s Report and Order (WT Docket No. 01-309), FCC 03-168, released August 14, 2003 (“R&O”).

By way of background information, the Filer is a small, Tier III Commercial Mobile Radio Service licensee, as defined in the Commission’s E-911 Order to Stay, FCC 02-210, released July 26, 2002. The Filer provides Frequency Block B cellular service to the B2 Segment of the Utah 5 – Carbon RSA; and Broadband PCS service within the Rock Springs, Wyoming, Grand Junction, Colorado, Denver, Colorado and Salt Lake City – Ogden, Utah BTAs. The digital portion of the Filer’s cellular system employs the Time Division Multiple Access (“TDMA”) air interface; and the Filer’s Broadband PCS systems employ the Code Division Multiple Access (“CDMA”) air interface. The Filer currently markets the following digital wireless telephones: A) Motorola Models 120E, T731, V60si, E310, V810, C343, and V265; B) Kyocera Models 2325, KE414, KE424, KE434, KE454, KE484, KE494, SE44, SOHO, KOI, 3245, and 7135; C) Nokia Model 3586i; and D) LG Models VX3100 and VX4400. In the near future, the Filer may add to its inventory the Motorola Models V262, Spirit and V710. Upon information and belief, none of these units meets a U3 or U3T rating under ANSI Standard C63.19.

To achieve compliance with the Hearing Aid Compatibility (“HAC”) requirements of the R&O, the Filer is literally at the mercy of the handset manufacturers to develop and market HAC-compliant digital wireless handsets. As a small, Tier III wireless carrier, the Filer has no influence over the product development and distribution

decisions of wireless handset manufacturers; and, accordingly, must rely on the manufacturers to develop HAC-compliant digital wireless handsets for use on the Filer's system.

Given the foregoing, the information requested by the Commission is identified as follows:

**Item 1 -- Digital Wireless Phones Tested:** The Filer has not tested any digital wireless telephones for HAC compliance. All testing will be done by the handset manufacturers.

**Item 2 -- Laboratory Used:** None. See Response to Item 1.

**Item 3 -- Test Results For Each Phone Tested:** Not applicable. See Response to Item 1.

**Item 4 -- Identification Of Compliant Phone Models and Ratings According To ANSI C63.19:** Upon information and belief, none of the handsets marketed by the Filer meet a U3 or U3T rating under ANSI Standard C63.19.

**Item 5 -- Report On The Status Of Product Labeling:** None. It is anticipated that product labeling will be handled by the handset manufacturers.

**Item 6 -- Report On Outreach Efforts:** The Filer is developing a hearing aid compatibility information sheet to assist hearing impaired customers in selecting current model phones and accessories most suitable to their needs.

**Item 7 -- Information Related To Retail Availability of Compliant Phones:** Upon information and belief, there are currently no handsets commercially available that meet a U3 or U3T rating under ANSI Standard C63.19.

**Item 8 -- Information Related To Incorporating Hearing Aid Compatibility Features Into Newer Models Of Digital Wireless Phones:** The incorporation of HAC features into newer models of digital wireless telephones will be accomplished by the handset manufacturers.

**Item 9 -- Any Activities Related To ANSI 63.19 Or Other Standards Work Intended To Promote Compliance With The Requirements Of The Commission's Report and Order:** None.

**Item 10 -- Total Numbers Of Compliant And Non-Compliant Phone Models Offered As Of The Date Of This Report:** Upon information and belief, there are currently no handsets commercially available that meet a U3 or U3T rating under ANSI Standard C63.19. The digital wireless phone models marketed by the Filer are as set forth in the second paragraph of this report; and, upon information and belief, none of these models meet a U3 or U3T rating under ANSI Standard C63.19.

**Item 11 -- Any Ongoing Efforts For Interoperability Testing With Hearing Aid Devices:** Interoperability testing will be performed by the handset manufacturers.

Very truly yours,

**Uintah Basin Electronic  
Telecommunications d/b/a  
UBET Wireless**

Dated: ✓ May 13, 2005

By: Bruce H. Todd  
Bruce H. Todd  
General Manager

**In accordance with Rule Section 1.12, please refer any inquiries or correspondence to:**

Robert M. Jackson  
Blooston, Mordkofsky, Dickens, Duffy & Prendergast  
2120 L Street, N.W.  
Suite 300  
Washington, D.C. 20037  
Tel.: 202-828-5515  
FAX: 202-828-5568  
E-mail: rmj@bloostonlaw.com